

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

THOMAS SHELTON,)
v.)
GREEN TREE SERVICING, LLC,)
Defendant.)
Plaintiff,) Civil Action No. 3:15-cv-00255 (JAG)
)
)
)

PLAINTIFF'S PROPOSED VOIR DIRE

Plaintiff, THOMAS SHELTON, by counsel, hereby submits the following proposed Voir Dire questions:

1. Prior to this lawsuit and the information you have learned so far in your participation as a juror in this jury panel, have any of you been aware that there were federal laws out there that governed the way that businesses could obtain, use and sell your credit information? If so, what is your familiarity with that law?
2. Prior to this lawsuit and your involvement in this lawsuit, have any of you known or heard of the Fair Credit Reporting Act?
3. Prior to this lawsuit and the information you have learned so far in your participation as a juror in this jury panel, have any of you been aware that there were federal laws out there that governed the way that businesses could attempt to collect debts they say are past due? If so, what is your familiarity with that law?
4. Prior to this lawsuit and your involvement in this lawsuit, have any of you known or heard of the Fair Debt Collections Practices Act?

5. Have you or anyone close to you or your immediate family ever had a problem concerning the accuracy of information on a credit report?

6. Have you or anyone close to you or your immediate family ever communicated with a credit reporting agency?

7. Have you ever requested your credit report from a credit reporting agency such as Experian, Equifax or Trans Union?

8. Have you ever reviewed your credit report provided by a credit reporting agency such as Experian, Equifax or Trans Union?

9. Do you have any opinions concerning the manner in which credit reporting agencies conduct their business?

10. Have you or has anyone close to you ever worked at a job that required you to have access to or review credit reports?

11. Have you or anyone close to you or your immediate family ever had any disputes with your mortgage company, commonly referred to as a mortgage servicer?

12. Have you or anyone close to you or your immediate family ever applied for a loan modification or other loss mitigation from your mortgage servicer?

13. Have or anyone close to you or your immediate family ever been offered or accepted a loan modification agreement from your mortgage servicer?

14. Do you have any opinions concerning the manner in which mortgage servicing companies conduct their business?

15. Have or anyone close to you or your immediate family ever been threatened with a foreclosure sale of your (or their) home?

16. Have you or has anyone close to you ever worked at a job that required you to have access or review credit reports?

17. Have you or has anyone close to you ever worked at a job that reviewed applications for loss mitigation or generally worked for a mortgage servicer?

18. This case involves claims arising from a consumer who applied for a loan modification agreement because he suffered a financial hardship. Do you have any negative beliefs, philosophies or reasons to think that this fact would make it difficult for you to find in favor of this individual regardless of the instructions provided to you by the Court?

19. This case involves claims arising under the Fair Credit Reporting Act that may provide for punitive damages against any person who willfully fails to comply with any requirement under the act. Do any of you believe, for whatever reason, that punitive damages should never be awarded to an individual regardless of the facts?

20. In spite of your own personal sympathies or philosophy, will you follow the court's instructions should the Judge allow you to consider the issue of punitive damages?

21. Are any of you philosophically, religiously or politically opposed to lawsuits or other damage suits, suits seeking money for consumers?

22. How many think that there should be a cap or limit on the amount that juries can award in civil lawsuits?

23. Is there anyone who believes that there is too much regulation of businesses?

24. Has anyone in this group ever sued someone in a civil lawsuit?

25. Has anyone in this group ever been sued in a civil lawsuit?

26. Has anyone in this group ever filed for bankruptcy?

27. Is anyone or any of your friends or family, involved with the legal system as

judges, lawyers, work for lawyers or the courthouse?

Respectfully Submitted,

THOMAS SHELTON

By: /s/
Counsel

Kristi Cahoon Kelly, VSB#72791

Andrew J. Guzzo, VSB #82170

KELLY & CRANDALL, PLC

4084 University Drive, Suite 202A

Fairfax, VA 22030

Telephone: 703-424-7572

Fax: 703-591-0167

Email: kkelly@kellyandcrandall.com

Email: aguzzo@kellyandcrandall.com

Leonard A. Bennett, Esq. (VSB #37523)

Susan Rotkis, Esq. (VSB #40639)

CONSUMER LITIGATION ASSOCIATES, P.C.

763 J. Clyde Morris Boulevard, Suite 1-A

Newport News, Virginia 23601

(757) 930-3660 - Telephone

(757) 930-3662 – Facsimile

E-mail: lenbennett@clalegal.com

E-mail: srotkis@clalegal.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of December, 2015, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system which will send a notification of such filing (NEF) to the following:

Constantinos G. Panagopoulos

Theodore R. Flo

BALLARD SPAHR LLP

1909 K Street, NW - 12th Floor

Washington, DC 20006-1157

Telephone: (202) 661-2200

Facsimile: (202) 661-2299

cgp@ballardspahr.com

flop@ballardspahr.com

Counsel for Defendant

/s/

Kristi Cahoon Kelly (VSB# 72791)

Kelly & Crandall, PLC

4084 University Drive, Suite 202A

Fairfax, VA 22030

Telephone: 703-424-7570

Facsimile: 703-591-0167

E-mail: kkelly@kellyandcrandall.com

Counsel for Plaintiff